

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: BISON LAND & MINERALS, LLC  
Debtor

CHAPTER 11  
CASE NO. 23-01140-JAW

NOTICE

NOTICE IS HEREBY GIVEN that the Debtor herein has filed its *Application to Employ Attorneys, and Disclosure of Compensation* (the "Application"), a copy of which Application is attached hereto as Exhibit "A".

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within twenty-one (21) days from and after the date of this Notice, with the Clerk of the Court, Mr. Danny L. Miller, the Clerk of the U. S. Bankruptcy Court, Southern District of Mississippi, Thad Cochran U.S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, and a copy of any objection must be served upon Craig M. Geno, Esq., Law Offices of Craig M. Geno, PLLC, counsel for the Debtors, at 587 Highland Colony Parkway, Ridgeland, MS 39157. Attorneys and other registered users of the Case Management/Electronic Case Filing (CM/ECF) system shall file any such objection electronically. In the event an objection to the Application is filed, it will be scheduled for hearing in due course.

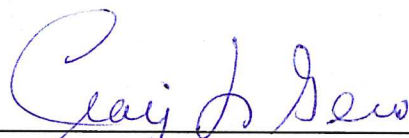
DATED, this the 17<sup>th</sup> day of May, 2023.

Respectfully submitted,

BISON LAND & MINERALS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
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**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:        BISON LAND & MINERALS, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 23-01140-JAW**

**APPLICATION TO EMPLOY ATTORNEYS,  
AND DISCLOSURE OF COMPENSATION**

COMES NOW Bison Land & Minerals, LLC (the “Debtor”), and files this its *Application to Employ Attorneys, and Disclosure of Compensation* (the “Application”), and in support thereof, would show unto the Court the following, to-wit:

1.        On May 15, 2023, the Debtor herein filed with this Court its original Petition for reorganization under Chapter 11 of the Bankruptcy Code.

2.        In order to facilitate the prudent performance of its duties and the successful operation of its business under this reorganization proceeding, it is necessary for the Debtor-in-possession to employ legal counsel. The professional services for which said attorneys will be retained to render shall include the following:

- a.        To advise and consult with the Debtor-in-possession regarding questions arising from certain contract negotiations which will occur during the operation of business by the Debtor-in-possession;
- b.        To evaluate and attack claims of various creditors who may assert security interests in the assets and who may seek to disturb the continued operation of the business.
- c.        To appear in, prosecute, or defend suits and proceedings, and to take all necessary and proper steps and other matters and things involved in or connected with the affairs of the estate of the Debtor;
- d.        To represent the Debtor in court hearings and to assist in the preparation of contracts, reports, accounts, petitions, applications, orders and other papers and documents as

**EXHIBIT “A”**

may be necessary in this proceeding;

- e. To advise and consult with Debtor in connection with any reorganization plan which may be proposed in this proceeding and any matters concerning Debtor which arise out of or follow the acceptance or consummation of such reorganization or its rejection; and
- f. To perform such other legal services on behalf of Debtor as they become necessary in this proceeding.

3. The Debtor desires to employ the Law Offices of Craig M. Geno, PLLC (the “Law Firm”) for the performance of these legal services. The Law Firm, whose offices are in Ridgeland, Mississippi, are fully competent to advise the Debtor-in-possession on all matters which are anticipated to arise in the functioning of this case and to protect and preserve all rights of the Debtor and the interests of creditors. The Debtor desires to employ the Law Firm at the following hourly rates: Craig M. Geno at \$450 per hour, plus expenses; Associates at \$275 per hour, plus expenses; and Paralegals at \$250 per hour, plus expenses; and have caused to be paid to the Law Firm a retainer of \$12,000, which includes the \$1,738 filing fee, less pre-petition time, to be applied to fees and expenses in this case. The Law Firm will bill at the rates set forth herein and, if necessary, submit requests for compensation to the Court for approval. The hourly rates are subject to adjustment annually following the end of the Law Firm’s fiscal year.

4. The Law Firm is now counsel for the Debtor, and as represented in the Affidavit attached hereto as Exhibit “A”, it represents no interests adverse to the Debtor or its estate and matters upon which it is to be engaged and its employment would be in the best interest of this estate. To the best of the Debtor’s knowledge, the Law Firm has no connection with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the Office

of the United States Trustee, or any employees of the Office of the United States Trustee, which are prohibited, which would interfere with or hinder the performance of its duties herein, or which need to be described herein.

WHEREFORE, the Debtor requests that it be authorized to employ and appoint the Law Firm as its attorneys and legal counsel, effective May 15, 2023. The Debtor prays for general relief.

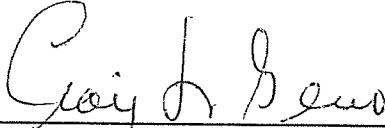
THIS, the 17<sup>th</sup> day of May, 2023.

Respectfully submitted,

BISON LAND & MINERALS, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)

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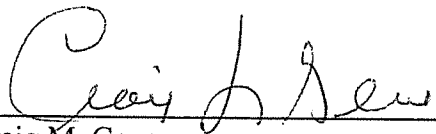
**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.j.steiskal@usdoj.gov](mailto:christopher.j.steiskal@usdoj.gov)

Robert A. Byrd  
Subchapter V Trustee  
[rab@byrdwiser.com](mailto:rab@byrdwiser.com)

THIS, the 17<sup>th</sup> day of May, 2023.

  
\_\_\_\_\_  
Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:       BISON LAND & MINERALS, LLC  
Debtor**

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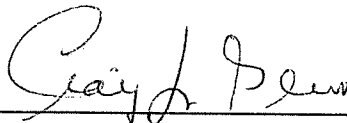
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**AFFIDAVIT**


PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno (the "Affiant") of the Law Offices of Craig M. Geno, PLLC (the "Law Firm"), attorneys for the Debtor, who after having been by me first duly sworn, stated on oath that this Affidavit is filed herein in support of the *Application to Employ Attorneys, and Disclosure of Compensation* (the "Application"), that the Law Firm now represents the Debtor, it represents no interests adverse to the Debtor or its estate and matters upon which it is to be engaged, and the Law Firm's employment would be in the best interest of this estate. To the best of the Affiant's knowledge, the Law Firm has no connections with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the Office of the U. S. Trustee, or any employees thereof, which are prohibited, which would interfere with or hinder the performance of its duties herein, or which need to be described herein. The Affiant hereby makes application for the employment of the Law Firm as attorneys and legal counsel for the Debtor.

  
\_\_\_\_\_  
Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 17<sup>th</sup> day of May, 2023.



  
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NOTARY PUBLIC